Jourdean Lorah 114 Walls Ave. Wilmington, Delaware 19805

June 9, 2008

Honorable Judge Sue Robinson United States District Court 844 N/. King Street Lockbox 18 Wilmington, Delaware 19801

Civ. No. 06-538-SLR



The following letter is concerning the above civil action number 06-538-SLR. Presently, I am unable to afford the representation of an attorney. I am currently awaiting another hearing regarding my welfare benefits (Medicaid/food stamps). Employment is less than twenty hours per week. My services presently are of a maid/caregiver.

I have sixteen years of professional experience and I am not receiving a salary that commiserates with my skill. There are no health benefits or retirement. On June 6, 2008, my second evening job (Senior Helpers) became a threat from the client and I am no longer employed in the evening. I was suppose to be eligible for health benefits in May 2008, but the client and his family violated my rights. I could no longer work with their condition and I asked my supervisor to reassign me to someone else. My part time day position is with Home Helpers.

The employment discrimination is continuing and I have not been charged with any violation. Therefore, the courts will not appoint me counsel. I am restricted/punished (not enough hours, low pay, no promotion, services of a maid only, no benefits and threats) by those who employ me or those who are directly involved with this case. The violations are criminal/civil and no one has offered to take my case pro-bono or on a contingency fee basis.

Unless, I am provided counsel, I can not continue the preparation of the teleconference as scheduled on June 9, 2008 at 2:30 with Magistrate Judge Stark. The Defendant's counsel has scheduled a deposition to take place on June 10, 2008 at 12:00 pm. I am not willing to be deposed without representation. It violates my rights and my privacy. I have a senior at home that I need to provide for. I am living in her home and I have responsibilities to pay the bills and take care of the maintenance on our home. I am in need and it is more important to secure what my mother and I need than the fraud/fame of those involved in this case. I respectively



**United States District Court** For The District of Delaware Honorable Judge Sue Robinson 844 N. King Street Lockbox 18 Wilmington., Delaware 19801

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counsel either through the courts of mediation or through The EEOC. The Equal Employment Opportunity Commission should have resolved my case several years ago.

Sincerely,

Jourdean Lorah

302-225-0540

ReedSmith

Reed Smith LLP 1201 Market Street Suite 1500 Wilmington, DE 19801-1163 +1 302 778 7500 Fax +1 302 778 7575 reedsmith.com

Katharine V. Jackson
Direct Phone: +1 302 778 7510
Email: KJackson@reedsmith.com

May 22, 2008

## VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Jourdean Lorah 114 Walls Avenue Wilmington, DE 19805

Re:

Jourdean Lorah v. Tetra Tech, Inc., et al. U.S.D.C. D.Del., No. 06-cv-538-SLR

Dear Ms. Lorah:

Enclosed is a Notice of Deposition scheduling your deposition for Tuesday, June 10, 2008 at 12:00 p.m. at Reed Smith LLP, 1201 Market Street, Suite 1500, Wilmington, Delaware.

Should you have any questions, please call me at (302) 778-7510.

Very truly yours,

Katharine V. Jackson

KVJ/dara Enclosure

cc:

Sara A. Begley, Esquire (w/enc.)

Shannon E. McClure, Esquire (w/enc.)

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Jourdean Lorah

Plaintiff.

C. A. No. 06-cy-00538

v.

Tetra Tech, Inc.

Defendant.

NOTICE OF DEPOSITION

**TO:** Jourdean Lorah 114 Walls Ave.

Wilmington, DE 19805

**DEPONENT: Jourdean Lorah** 

PLEASE TAKE NOTICE that on June 10, 2008 at 12:00 p.m., the undersigned shall proceed at the law offices of Reed Smith LLP, 1201 Market Street, Suite 1500, Wilmington, Delaware, before a person authorized by the State of Delaware to take the testimony upon oral examination of the above-mentioned deponent with respect to all matters relevant to the subject matter of this action. The deposition will take place on the designated date and will continue from day to day until completed.

Of Counsel: Sara A. Begley Shannon Elise McClure REED SMITH LLP 2500 One Liberty Place 1650 Market Street Philadelphia, PA 19103 Telephone: (215) 851-8100

Dated: May 22, 2008

Respectfully submitted,

By: /s/ Katharine V. Jackson
Katharine V. Jackson (DE Bar ID No. 4800)

REED SMITH LLP

1201 Market Street, Suite 1500

Wilmington, DE 19801

Telephone: (302) 778-7500

Facsimile: (302) 778-7575

Attorneys for Defendant.

Tetra Tech, Inc.

## **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a copy of Defendant's Notice of Deposition Directed to Plaintiff was served via U.S. First Class Certified Mail, Return Receipt Requested upon the following:

Jourdean Lorah 114 Walls Ave. Wilmington, DE 19805

> /s/ Katharine V. Jackson Katharine V. Jackson

Dated: May 22, 2008



Honorable Judge Sue Robinson United States District Court

844 N/. King Street Lockbox 18

Wilmington, Delaware 19801

Civ. No. 06-538-SLR

Wilmington, Delaware 19805

Jourdean Lorah 114 Walls Ave. 302-301-0361

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